

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

VICTOR H. MAIA

Debtor.

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Chapter 11

Case No.: 18-16907-AMC

**LIMITED OBJECTION OF WRONGFUL DEATH CREDITORS
TO DEBTOR'S THIRD AMENDED
PLAN AND DISCLOSURE STATEMENT**

Willie Jamar Nobles, individually and as administrator of the estate of Jamar Willie Nobles, Diana Wilson, as administratrix of the estate of Rasheedah Wilson and in her own right, and Maurice Butts, as administrator of the estate of Rasheed Wilson and Anthony Patterson, Administrator of the Estate of Shani Masirah Patterson (the "Wrongful Death Creditors") object to the Third Amended Small Business Plan of Reorganization (the "Plan") and Disclosure Statement filed by the Debtor.

I. LIMITED OBJECTION

1. The Debtor and Wrongful Death Creditors recently completed a successful mediation in which the parties reached an agreement in principal which they intend to consummate through a plan of reorganization. The Plan, as filed, is not yet in a form which is acceptable to the Wrongful Death Creditors but the parties continue working on a final form of the Plan. The Wrongful Death Creditors anticipate this process will ultimately result in a successful resolution of the matter. The Wrongful Death Creditors believe a short adjournment of the hearing on this matter is appropriate.

2. The Wrongful Death Creditors file this objection solely to reserve their rights in the unlikely event the Debtor and Wrongful Death Creditors are unable to finalize an acceptable plan. Wrongful Death Creditors incorporate their objections to the Debtor's prior plans to the extent still applicable.

WHEREFORE, the Wrongful Death Creditors respectfully request that the confirmation of the Plan and approval of the Disclosure Statement be adjourned and denied if not adjourned.

Date: May 4, 2020

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

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